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December 20, 1996

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OUR FILE NO.

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VIA MESSENGER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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DEC 20 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Notice of Ex Parte Contact
ET Docket No. 96-102

Dear Mr. Caton:

On December 19, 1996, Carl Northrop and I, representing ReSound Corporation ("ReSound"), held a telephone conference with David Siddall, Legal Advisor to Commissioner Susan Ness, to discuss issues under consideration in the above-referenced docket. The discussion was consistent with ReSound's comments of record in the docket. A copy of the attached materials was provided to Mr. Siddall prior to the telephone conference.

Kindly refer any questions in connection with this matter to the undersigned.

Very truly yours,


E. Ashton Johnston

Enclosure

cc: David Siddall (w/o enclosure)

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ReSound Corporation

- **4th Largest Hearing Health Care Company in the World**
- **#1 Programmable Hearing Health Care Company**
 - **ReSound Technology (MBFDRC)**
 - **Spinoff from At&T**
 - **Acquisitions**
 - **3M Hearing Health Care**
 - **Viennatone, Austria**
 - **Sonar, Germany**
- **One of the Fastest Growing Companies in America (Inc 100)**
- **ReSound Manufacturing Plants**
 - **Redwood City, CA**
 - **Vienna, Austria**
 - **Munster Germany**
 - **Cork, Ireland**

ReSound Commitments to Hearing-Impaired

- **Hearing Health Care Community Improvements**
- **Largest R&D/Rev Ratio in the Business**
- **Active Involvement in Movements**
 - **SHHH (Self Help for the Hard of Hearing)**
 - **ASHA Member (American Speech Language and Hearing Assn.)**
 - **AAA Member (American Academy of Audiology)**

Hearing Health Care Customer Benefits of ReSound's Ear Voice Link (EVLink™)

- **Allows Full DSP Power for Hearing Solutions**
 - Audio Beam Forming
 - Adaptive Speech Filtering
 - Improved Hearing in Presence of Noise
 - Research Platform for Universities and Hospitals
- **Allows Hearing-Impaired to be Connected to Other Sound Sources**
 - Education and Training
 - Home Entertainment
 - Home/Office - Telephone or Computer
- **Removes Stigma for Hearing-Impaired**
- **Designed to Operate in the 5.850-5.875 GHz “Quiet Band”**

■ **Hearing Aid Industry**

- **\$2B/Yr**
- **1.75M Devices/Yr**
- **5.8M Customers**
- **20M Hearing-Impaired Non-Users Indicate Market Growth Potential**

■ **New Wireless Hearing Aid Technology**

- **Signals Enhanced in Remote Processor**
- **Binaural Noise Cancellation**
- **Wireless Adapters to Cellular Phones and Other Communication Devices**

■ **5850-5875 MHz Operation for Small Earpiece**

- **Quarter Wavelength is one-half inch**
- **Antenna Disguised as Ear Hair**
- **Required for User Acceptance & Market Penetration**

ReSound's Comments on the NPRM

- **ReSound Generally Supports Unlicensed, High-Speed “NII/SUPERNet” Operations**
- **The Record does not Reflect a Need for a 350 MHz Allocation for NII/SUPERNet**
- **The “Quiet Band” Should not be Affected by NII/SUPERNet Operations**
 - **There is Confusion Among the Commenters About the 5.850-5.875 GHz Portion on the ISM Band**
 - **One-Watt Operations are not Presently Permitted at 5.850-5.875 GHz. See 47 C.F.R., 15.249 and OET Bulletin No. 63, “Understanding the FCC Regulations for Low-Power, Non-Licensed Transmitters,” Dec. 1994, p.25.**
- **The Commission has an Obligation Under the Americans with Disabilities Act and the Telecommunications Act of 1996 to Protect and Promote the Interests of the Hearing-Impaired**

Special Attributes of the Quiet Band

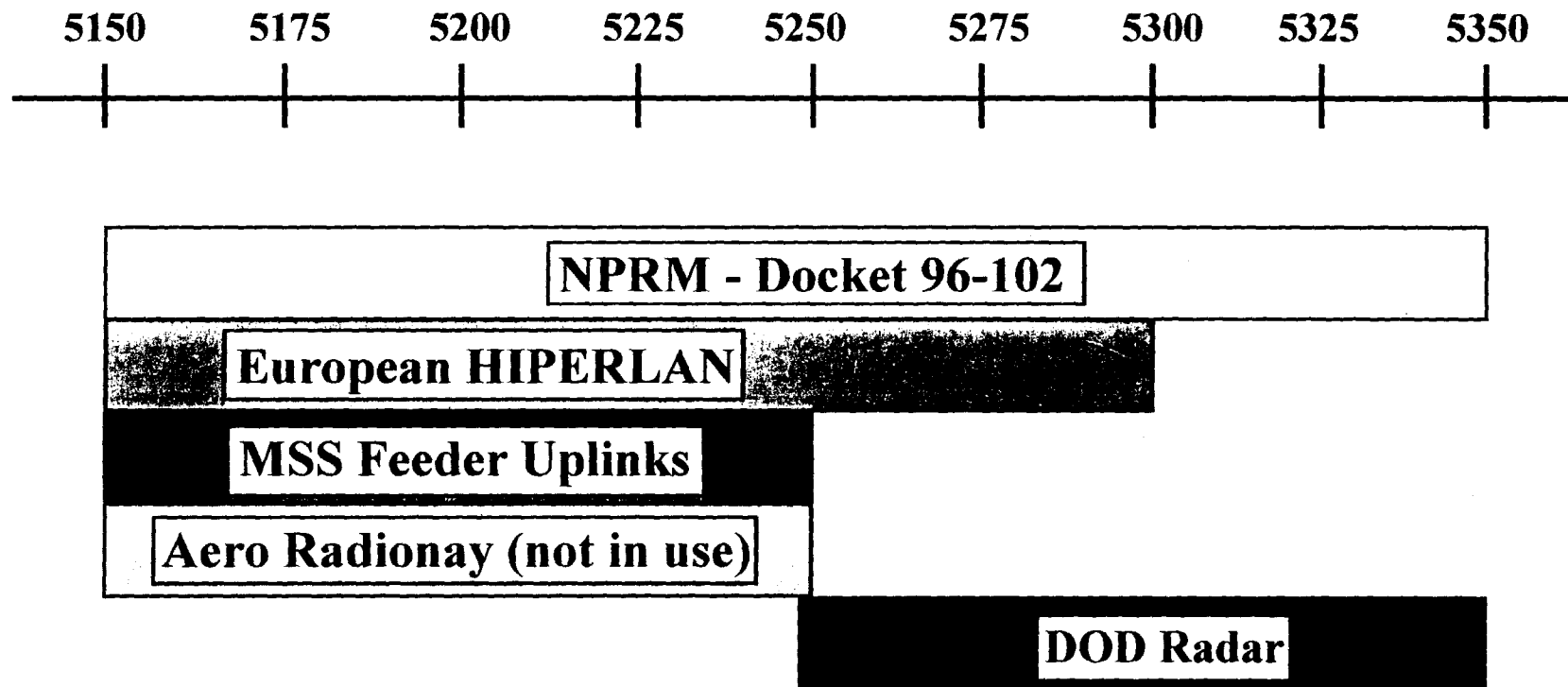
- **The Quiet Band Supports Low Power Operations Only**
- **Section 15.247 Spread Spectrum Transmitters are not Permitted in the Quiet Band**
 - **Many Commenters Overlook or Ignore this Restriction**
 - **No Change to this Restriction has been Proposed in ET Docket No. 96-8 or ET Docket No. 96-102**
- **The Quiet Band Offers a Unique Environment for the Development of Multiple Non-Exclusive Technologies, such as ReSound's EVLink™**
 - **The Quiet Band is Uniquely Suited to Innovative Uses such as ReSound has Proposed**
- **Many Users Already Co-Exist in the Quiet Band**
 - **ISM**
 - **Amateur Radio**
 - **FSS**
 - **DOD**
 - **ITS has Stated that Sharing with Existing Users is Possible**

ISM Equipment and NII/SUPERNet Devices Can Share, Provided That:

- **NII/SUPERNet Devices are not Allowed to Operate in the Quiet Band**
- **ISM Equipment Continues to Have Primary Status in the 5.725-5.850 GHz Band**
- **The Commission Adopts its Proposed Power Limits for NII/SUPERNet Devices**

ReSound

5.2 GHz Landscape



ReSound

5.8 GHz Landscape

